

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,
AND IRBESARTAN PRODUCTS
LIABILITY LITIGATION**

This Document Relates to All Actions

MDL No. 2875

Honorable Robert B. Kugler,
District Court Judge

**DEFENDANTS ZHEJIANG HUAHAI PHARMACEUTICAL CO., LTD.,
HUAHAI U.S., INC., PRINSTON PHARMACEUTICAL INC., AND SOLCO
HEALTHCARE U.S., LLC'S MOTION TO AMEND OR CORRECT THE
COURT'S OPINION ON THE PARTIES' LIABILITY EXPERTS**

PLEASE TAKE NOTICE that on February 20, 2024, Defendants Zhejiang Huahai Pharmaceutical Co., Ltd.; Huahai U.S., Inc.; Princeton Pharmaceutical Inc.; and Solco Healthcare U.S., LLC (collectively, the “ZHP Defendants”), by and through their undersigned counsel, shall move for the entry of an Order amending and correcting the Court’s January 5, 2024, opinion excluding in part several of the parties’ liability experts’ opinions. (*See generally* [ECF No. 2581](#).) This motion is made to the Hon. Robert B. Kugler, United States District Judge, pursuant to the applicable Federal Rules of Civil Procedure and the applicable local rules of this Court.

PLEASE TAKE FURTHER NOTICE that in support of this motion, the ZHP Defendants shall rely on the accompanying Memorandum of Law in Support of Motion to Amend or Correct the Court’s Opinion on the Parties’ Liability Experts.

PLEASE TAKE FURTHER NOTICE that a proposed Order is submitted herewith;

PLEASE TAKE FURTHER NOTICE that oral argument is requested, if this motion is opposed; and

PLEASE TAKE FURTHER NOTICE that a Certificate of Service attesting to the date and manner of service is submitted herewith.

Dated: January 17, 2024

Respectfully submitted,

By: /s/ Jessica Davidson

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Inc., Princeton Pharmaceutical Inc., and
Solco Healthcare U.S., LLC*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on January 17, 2024, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to all CM/ECF participants in this matter.

/s/ Jessica Davidson

Jessica Davidson (NY Bar No. 6034748)